

**Exhibit 6D**

**8/4/2014 Deposition Transcript of D. Muchmore (excerpted)**

DENNIS MUCHMORE  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

In re ) Chapter 9  
CITY OF DETROIT, MICHIGAN, ) Case No. 13-53846  
Debtor. ) Hon. Steven W. Rhodes

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The Videotaped Deposition of DENNIS MUCHMORE,  
a 30(b)(6) witness,  
Taken at 215 South Washington Square, Suite 200,  
Lansing, Michigan,  
Commencing at 9:00 a.m.,  
Monday, August 4, 2014,  
Before Rebecca L. Russo, CSR-2759, RMR, CRR.

<p style="text-align: right;">Page 53</p> <p>1 DENNIS MUCHMORE</p> <p>2 mean once a week or do you mean --</p> <p>3 Q. Once a week, let's start with.</p> <p>4 A. We don't have a formal once-a-week meeting, no.</p> <p>5 Q. Based on your knowledge, does it happen for one reason</p> <p>6 or another that the governor -- someone from the</p> <p>7 governor's office is talking to the mayor of Detroit</p> <p>8 about once a week?</p> <p>9 A. Oh, yes.</p> <p>10 Q. And what's the nature of those conversations,</p> <p>11 typically?</p> <p>12 A. They would be anything from what help can we give you</p> <p>13 on a -- income tax collections, to this is my latest</p> <p>14 argument on Belle Isle, to here is somebody we're</p> <p>15 hiring, what do you think about that, mayor to us.</p> <p>16 We have a lot of discussions about the</p> <p>17 transition that's coming and how that is going to</p> <p>18 affect relationships.</p> <p>19 Q. And what transition is that?</p> <p>20 A. Well, Mr. Orr will be leaving in September, leaving</p> <p>21 his emergency manager position.</p> <p>22 Q. Will Mr. Orr be maintaining other, any other position</p> <p>23 in relationship to the State of Michigan, to your</p> <p>24 knowledge, after he leaves in September?</p> <p>25 A. Not to my knowledge.</p>	<p style="text-align: right;">Page 55</p> <p>1 DENNIS MUCHMORE</p> <p>2 a different topic.</p> <p>3 A. Okay.</p> <p>4 Q. Prior to the mediation, did the State have any view,</p> <p>5 to your knowledge, based on what the priority of the</p> <p>6 pensioners -- based on the priority the pensioners</p> <p>7 should receive any funds that come from the State,</p> <p>8 vis-a-vis other creditors in the Detroit bankruptcy?</p> <p>9 A. No, not to my knowledge.</p> <p>10 MR. MORRIS: Objection, form.</p> <p>11 THE WITNESS: What was that?</p> <p>12 MS. NELSON: Somebody on the telephone had</p> <p>13 an objection.</p> <p>14 THE WITNESS: Oh, okay.</p> <p>15 BY MR. MCCARTHY:</p> <p>16 Q. That's what I mentioned earlier, someone objects and</p> <p>17 we have a few people --</p> <p>18 A. Okay.</p> <p>19 Q. -- on the phone that represent other -- I believe they</p> <p>20 represent other parties, not the State, but you can go</p> <p>21 ahead and answer the question, if you can, with that</p> <p>22 objection, which you did. Thank you.</p> <p>23 Prior to the mediation, did the State have</p> <p>24 any view, to your knowledge, with respect to whether</p> <p>25 any funds that would be coming from the State should</p>
<p style="text-align: right;">Page 54</p> <p>1 DENNIS MUCHMORE</p> <p>2 Q. Thank you. Within your role within the executive</p> <p>3 office, would you say that you take part in most</p> <p>4 formal meetings that relate to the City of Detroit and</p> <p>5 its bankruptcy?</p> <p>6 A. Yes, I would.</p> <p>7 Q. Are you typically made aware of any formal press</p> <p>8 releases that come from the governor's office that</p> <p>9 relate to the City of Detroit's bankruptcy?</p> <p>10 A. Typically. It's kind of a general word.</p> <p>11 Q. It is, and I apologize for that.</p> <p>12 A. That's all right.</p> <p>13 Q. But what is the process when the governor's office is</p> <p>14 going to make a formal statement in the press,</p> <p>15 specifically with respect to the City of Detroit's</p> <p>16 bankruptcy over the last year?</p> <p>17 A. We would talk about it at comms. Comms, I mean, we</p> <p>18 have a comms meeting, as I described earlier. We'd</p> <p>19 talk about it at comms. We typically run the content</p> <p>20 of that press release past our legal counsels, and we</p> <p>21 typically run that content of that past Kevyn Orr.</p> <p>22 And sometimes we may give the mayor a heads-up if it</p> <p>23 deals with his, you know, the political machinations</p> <p>24 of the city.</p> <p>25 Q. And if -- did the State have any view -- moving on to</p>	<p style="text-align: right;">Page 56</p> <p>1 DENNIS MUCHMORE</p> <p>2 go solely to the benefit of the pensioners versus</p> <p>3 other creditors in the bankruptcy?</p> <p>4 A. No.</p> <p>5 Q. Has that view changed since the onset of mediation,</p> <p>6 from the State's perspective?</p> <p>7 A. No, not really, no. I don't think the view has</p> <p>8 changed on that. It's not a focus on one thing. It's</p> <p>9 a focus on a comprehensive solution of the whole City</p> <p>10 bankruptcy. We spend a lot of time with creditors.</p> <p>11 We spend a lot of time with pensioners. We spend a</p> <p>12 lot of time with judges.</p> <p>13 Q. Funding for the State under the Grand Bargain, as it's</p> <p>14 been described, will be going to pensioners,</p> <p>15 specifically, as opposed to certain other groups of</p> <p>16 creditors, is that fair?</p> <p>17 A. I think that's fair, yes.</p> <p>18 Q. Does the State have a view, to your knowledge, based</p> <p>19 on why it is that that funding will be going to</p> <p>20 pensioners versus other creditors?</p> <p>21 MS. NELSON: I'm going to object, because</p> <p>22 that invades the confidentiality of the mediation</p> <p>23 process, and I will instruct him not to answer that</p> <p>24 question.</p> <p>25 BY MR. MCCARTHY:</p>

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<p style="text-align: right;">Page 57</p> <p>1 DENNIS MUCHMORE</p> <p>2 Q. I assume you will follow those instructions, but let</p> <p>3 me ask you, just to be sure. Will you follow those</p> <p>4 instructions from your counsel and not answer the</p> <p>5 question?</p> <p>6 A. I always do.</p> <p>7 MR. GADOLA: Always?</p> <p>8 THE WITNESS: Generally, when I agree with</p> <p>9 it, I do.</p> <p>10 MR. MCCARTHY: I'm going to ask another</p> <p>11 question, Margaret, that may call for the same answer,</p> <p>12 and that's absolutely fine and appropriate, I'm sure,</p> <p>13 but let me -- just so we can streamline some of the</p> <p>14 other material.</p> <p>15 BY MR. MCCARTHY:</p> <p>16 Q. Since the mediation has started, has the State --</p> <p>17 earlier we talked about that, to your knowledge, you</p> <p>18 weren't aware of the State having any view as to the</p> <p>19 priority of pensioners, as to who should get paid when</p> <p>20 or what they should get paid within the State's</p> <p>21 bankruptcy.</p> <p>22 I want to ask now, since the mediation,</p> <p>23 does the State have a view, with respect to the</p> <p>24 priority that pensioners should be paid, vis-a-vis</p> <p>25 other creditors in the Detroit bankruptcy?</p>	<p style="text-align: right;">Page 59</p> <p>1 DENNIS MUCHMORE</p> <p>2 the pensioners might have to face reductions in the</p> <p>3 benefits that they receive under their pensions for</p> <p>4 the City of Detroit?</p> <p>5 A. Yes, I believe so.</p> <p>6 Q. And prior to the mediation, did the -- to your</p> <p>7 knowledge, was it the State's view that that could</p> <p>8 happen, that the pensioners for the City of Detroit</p> <p>9 might face reductions in the amount that they receive</p> <p>10 under their pensions?</p> <p>11 A. Yes.</p> <p>12 Q. What was the basis for that view, as you understand</p> <p>13 it, coming from the State? And again, if this only</p> <p>14 comes from information from your lawyers, I'd like to</p> <p>15 try to stay away from that.</p> <p>16 MR. MORRIS: Objection, form.</p> <p>17 A. There are only so many ways to get to an overall</p> <p>18 comprehensive settlement of this, and each party in</p> <p>19 the settlement was going to have to take a reduction</p> <p>20 in what they felt they were being owed, regardless of</p> <p>21 who it was, and there was just no way around it, from</p> <p>22 our point of view.</p> <p>23 BY MR. MCCARTHY:</p> <p>24 Q. Has that -- moving forward. For whatever reason, has</p> <p>25 that viewpoint from the State that every party,</p>
<p style="text-align: right;">Page 58</p> <p>1 DENNIS MUCHMORE</p> <p>2 MS. NELSON: I'm going to assert the same</p> <p>3 objection.</p> <p>4 MR. MORRIS: Objection, form.</p> <p>5 MS. NELSON: Thank you. I was going to</p> <p>6 object as to form and foundation, as well, and also</p> <p>7 that it invades the confidentiality of the mediation</p> <p>8 process, and instruct him not to answer.</p> <p>9 MR. MCCARTHY: And so I'm --</p> <p>10 MS. NELSON: Also, attorney-client</p> <p>11 privilege.</p> <p>12 MR. MCCARTHY: And so I'm clear, any</p> <p>13 information that I might be able to gather from that</p> <p>14 that is not based on attorney-client, should I still</p> <p>15 expect an objection based on the mediation order if it</p> <p>16 gets into the substance of the State's view with</p> <p>17 respect to priority of the pensioners or whether --</p> <p>18 why it is that -- if the State has a view as to why</p> <p>19 money should go to the benefit of the pensioners after</p> <p>20 the August mediation began?</p> <p>21 MS. NELSON: Correct. It invades the</p> <p>22 confidentiality of the mediation process.</p> <p>23 BY MR. MCCARTHY:</p> <p>24 Q. Prior to the mediation, to your knowledge, did the</p> <p>25 State ever make any statements with respect to whether</p>	<p style="text-align: right;">Page 60</p> <p>1 DENNIS MUCHMORE</p> <p>2 including perhaps the pensioners, may need to take a</p> <p>3 reduction, has that view changed at all --</p> <p>4 MR. MORRIS: Objection, form.</p> <p>5 BY MR. MCCARTHY:</p> <p>6 Q. -- has that view changed at all from the State?</p> <p>7 MS. NELSON: I'm going to object as to</p> <p>8 form. I'm also going to object on the basis of</p> <p>9 attorney-client privilege, and that it invades the</p> <p>10 confidentiality of the mediation process, as there is</p> <p>11 more than just pensions involved in the mediation</p> <p>12 process, and instruct him not to answer.</p> <p>13 MR. MCCARTHY: And can I assume that to the</p> <p>14 extent my question asks for information after</p> <p>15 August 2013, there will be an objection based on the</p> <p>16 confidentiality order related to the mediation if</p> <p>17 we're asking for information with respect to the</p> <p>18 State's view on whether the pensioners could face</p> <p>19 reductions in the amounts they receive under their</p> <p>20 pensions?</p> <p>21 MS. NELSON: Yes, that's a principal issue</p> <p>22 of the mediation.</p> <p>23 BY MR. MCCARTHY:</p> <p>24 Q. And I assume you will follow that instruction from</p> <p>25 your counsel?</p>

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